

# EXHIBIT 28

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From: Mike Sarrao  
Sent: Tue 8/6/2019 2:24:42 AM  
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[EORH LTC Closure Timeline.xlsx](#)  
[EORH Closure Timeline.xlsx](#)  
[OVMC Closure Timeline.xlsx](#)

All,

Please find attached updated closure timelines for OVMC, EORH, and EORH LTC. Please review and provide comments. I **really need** your help on these and I tried my best to use dates that are realistic combined with legal requirements.

Couple of notes:

1. Sylvia – Do not share these with CNOs at OV & EO until Thursday, 8/8/19. Dan will notify senior management, employees, etc., on Wednesday and we do not discuss with them until after that.
2. I broke down EORH into Acute and LTC as there are more specific requirements for LTC. Medicare requires 60 days' notice (as opposed to 15 days for acute) and Ohio Medicaid requires 90 days' notice.
3. I am sure I missed something so please let me know what I missed.

The best way to get me comments is to either handwrite on the documents and send PDF to me or mark-up the excel spreadsheets in red.

Mike

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**Closure Timeline for EORH LTC**

Medicare - 60 Days Advance Notice and Publish 15 Days before closure  
 Ohio Medicaid - 90 Days Advance Notice  
 All Dates Assume Physician Coverage and Staffing  
**East Ohio Regional Hospital**

|            | Action Item  | Owner  | Deadline                                     |
|------------|--|--------|--|
| <b>1.0</b> | <b>Notification to Federal and State Agencies &amp; Accreditation Bodies</b> | Sarrao |  |
| 1.1        | Center for Medicare and Medicaid Services (CMS)                              |        | 8/8/2019                                     |
| 1.1.1      | 60 Days Notice to CMS Per 42 CFR 489.52(a)(2)                                |        | 8/8/2019                                     |
| 1.1.2      | Publish Notice in Newspaper 15 Days Before Closure per 42 CFR 489.52(c)      |        | 8/12/2019                                    |
| 1.2        | Drug Enforcement Administration  |        | 8/8/2019                                     |
| 1.3        | FTC (Radio Channels)   |        | 8/8/2019                                     |
| 1.4        | Ohio Department of Health  |        | 8/8/2019                                     |
| 1.5        | Ohio Medicaid  |        | 8/8/2019                                     |
| 1.5.1      | 90 Days Notice to Ohio Medicaid per RC 5165.50                               |        | 8/8/2019                                     |
| 1.6        | Ohio Labor   |        | 8/8/2019                                     |
| 1.7        | City of Martins Ferry  |        | 8/8/2019                                     |
| 1.8        | Joint Commission   |        | 8/8/2019                                     |
| 1.9        | College of American Pathologists   |        | 8/8/2019                                     |
| <b>2.0</b> | <b>Suspension/Closure of LTC</b>   |        |  |
| <b>2.1</b> | <b>Stop Accepting New Patients for Admission</b>                             |        |  |
| 2.1.1      | Notice to Ohio Medicaid  |        | 8/15/2019                                    |
| 2.1.2      | Notice to Referral Sources   |        | 8/8/2019                                     |
| <b>2.2</b> | <b>Notice to Existing Patients Re: Suspension of Suspension</b>              |        |  |
| 2.2.1      | Notice to Existing Patients & Family Members                                 |        | 8/9/2019                                     |
| 2.2.2      | Notice to Existing Patient's Primary Care Physician                          |        | 8/9/2019                                     |
| <b>2.3</b> | <b>Transition of Existing Patients</b>                                       |        |  |
| 2.3.1      | Discharge Patients when appropriate  |        | Ongoing                                      |
| 2.3.2      | Identify Alternative Facilities to Accept Patients                           |        | Ongoing                                      |
| 2.3.3      | Communicate with Existing Patients and Family Members Re: Transfer           |        | Ongoing                                      |
| <b>2.4</b> | <b>Suspend LTC Services</b>  |        |  |
| 2.4.1      | Transition All Patients  |        | Ongoing                                      |
| 2.4.2      | Suspend Services   |        | 11/8/2019 (or until last patient discharged) |
| <b>6.0</b> | <b>Medical Records</b>   |        |  |
| 6.1        | Secure Medical Records   |        | 8/9/2019                                     |
| 6.2        | Notice to Public Regarding Availability of Medical Records                   |        | 8/12/2019                                    |
| 6.3        | Make Arrangements for Continued Storage of Medical Records                   |        | 9/15/2019                                    |

Native File Placeholder

**Closure Timeline for EORH Acute**

Medicare - Publish Notice 15 Days Before Closure

Target Closure 9/8/19

All Dates Assume Physician Coverage and Staffing

**East Ohio Regional Hospital**

|            | Action Item   |   | Owner | Deadline  |
|------------|---|---|-------|-----------|
| <b>1.0</b> | <b>Notification to Federal and State Agencies &amp; Accreditation Bodies</b>    |   | Sarao |           |
| 1.1        | Center for Medicare and Medicaid Services (CMS)                                 |   |       | 8/8/2019  |
|            | 1.1.1   | Publish Notice in Newspaper 15 Days Before Closure per 42 CFR 489.52(c) |       | 8/12/2019 |
| 1.2        | Drug Enforcement Administration   |   |       | 8/8/2019  |
| 1.3        | FTC (Radio Channels)  |   |       | 8/8/2019  |
| 1.4        | Ohio Department of Health   |   |       | 8/8/2019  |
| 1.5        | Ohio Medicaid   |   |       | 8/8/2019  |
| 1.6        | Ohio Emergency Services   |   |       | 8/8/2019  |
| 1.7        | Ohio Labor  |   |       | 8/8/2019  |
| 1.8        | City of Martins Ferry   |   |       | 8/8/2019  |
| 1.9        | Joint Commission  |   |       | 8/8/2019  |
| 1.10       | College of American Pathologists  |   |       | 8/8/2019  |
| <b>2.0</b> | <b>Suspension/Closure of Outpatient Services</b>                                |   |       |           |
| <b>2.1</b> | <b>Stop Accepting New Patients for Outpatient Services</b>                      |   |       |           |
|            | 2.1.1   | Sleep Lab   |       | 8/16/2019 |
|            | 2.1.2   | Cardiac Testing   |       | 8/16/2019 |
|            | 2.1.3   | Physical Therapy  |       | 8/16/2019 |
|            | 2.1.4   | Occupational Therapy  |       | 8/16/2019 |
|            | 2.1.5   | Speech Therapy  |       | 8/16/2019 |
|            | 2.1.6   | Medical Oncology  |       | 8/16/2019 |
|            | 2.1.7   | Radiation Oncology  |       | 8/16/2019 |
|            | 2.1.8   | Laboratory Services   |       | 8/16/2019 |
|            | 2.1.9   | Radiology   |       | 8/16/2019 |
| <b>2.2</b> | <b>Notice to Existing Patients Utilizing Outpatient Services Re: Suspension</b> |   |       |           |
|            | 2.2.1   | Sleep Lab   |       | 8/9/2019  |

|            | Action Item   |   | Owner | Deadline  |
|------------|---|---|-------|-----------|
|            | 2.2.2   | Cardiac Testing                         |       | 8/9/2019  |
|            | 2.2.3   | Physical Therapy                        |       | 8/9/2019  |
|            | 2.2.4   | Occupational Therapy                    |       | 8/9/2019  |
|            | 2.2.5   | Speech Therapy                          |       | 8/9/2019  |
|            | 2.2.6   | Medical Oncology                        |       | 8/9/2019  |
|            | 2.2.7   | Radiation Oncology                      |       | 8/9/2019  |
|            | 2.2.8   | Laboratory Services                     |       | 8/9/2019  |
|            | 2.2.9   | Radiology                               |       | 8/9/2019  |
| <b>2.3</b> | <b>Stop Providing Outpatient Services to Existing Patients/Suspend Services</b> |   |       |           |
|            | 2.3.1   | Sleep Lab                               |       | 8/31/2019 |
|            | 2.3.2   | Cardiac Testing                         |       | 8/31/2019 |
|            | 2.3.3   | Physical Therapy                        |       | 8/31/2019 |
|            | 2.3.4   | Occupational Therapy                    |       | 8/31/2019 |
|            | 2.3.5   | Speech Therapy                          |       | 8/31/2019 |
|            | 2.3.6   | Medical Oncology                        |       | 8/31/2019 |
|            | 2.3.7   | Radiation Oncology                      |       | 8/31/2019 |
|            | 2.3.8   | Laboratory Services                     |       | 8/31/2019 |
|            | 2.3.9   | Radiology                               |       | 8/31/2019 |
| <b>3.0</b> | <b>Suspension/Closure of Surgical Services</b>                                  |   |       |           |
| 3.1        | <b>Stop Accepting New Patients for Elective Surgeries</b>                       |   |       |           |
|            | 3.1.1   | Outpatient Surgery                      |       | 8/16/2019 |
|            | 3.1.2   | Surgeries Requiring Inpatient Admission |       | 8/16/2019 |
| 3.2        | <b>Notify Existing Patients with Scheduled Surgeries</b>                        |   |       |           |
|            | 3.2.1   | Outpatient Surgery                      |       | 8/12/2019 |
|            | 3.2.2   | Surgeries Requiring Inpatient Admission |       | 8/12/2019 |
| 3.3        | <b>Stop Performing Elective Surgeries</b>                                       |   |       |           |
|            | 3.3.1   | Outpatient Surgery                      |       | 9/6/2019  |
|            | 3.3.2   | Surgeries Requiring Inpatient Admission |       | 9/3/2019  |
| <b>4.0</b> | <b>Inpatient Services (Excluding LTC)</b>                                       |   |       |           |
| 4.1        | Notify Medical Staff of No Direct Admissions as of 8/16/19                      |   |       |           |
| 4.2        | Stop Direct Admissions  |   |       |           |
| 4.3        | Stop Admissions from Emergency Department (See Item 6.0 Below)                  |   |       |           |
| 4.4        | Transfer Remaining Inpatients (Excluding LTC)                                   |   |       |           |

|            | Action Item  | Owner | Deadline  |
|------------|--|-------|-----------|
| 4.5        | Suspend All Inpatient Services (Excluding LTC)               |       | 9/8/2019  |
| <b>5.0</b> | <b>Emergency Services</b>                                    |       |           |
| 5.1        | Notify EMS of Planned Suspension of Services and Limitations |       | 8/8/2019  |
| 5.2        | Notify Public of Planned Suspension of Services              |       | 8/12/2019 |
| 5.3        | Stop Accepting EMS Runs                                      |       | 9/3/2019  |
| 5.4        | Stop Accepting Walk-Ins                                      |       | 9/7/2019  |
| 5.5        | Suspend Emergency Services                                   |       | 9/8/2019  |
| <b>6.0</b> | <b>Medical Records</b>                                       |       |           |
| 6.1        | Secure Medical Records                                       |       | 8/9/2019  |
| 6.2        | Notice to Public Regarding Availability of Medical Records   |       | 8/15/2019 |
| 6.3        | Make Arrangements for Continued Storage of Medical Records   |       | 9/3/2019  |

Native File Placeholder

**Closure Timeline for OVMC**

Medicare - Publish Notice 15 Days Before Closure; WV - Publish Notice 21 Days Before Closure

Target Closure 9/8/19

All Dates Assume Physician Coverage and Staffing

**Ohio Valley Medical Center**

|            |  | Action Item   | Owner  | Deadline  |
|------------|--|---|--------|-----------|
| <b>1.0</b> | <b>Notification to Federal and State Agencies &amp; Accreditation Bodies</b> |   | Sarrao |           |
| 1.1        | Center for Medicare and Medicaid Services (CMS)                              |   |        | 8/9/2019  |
|            | 1.1.1  | Publish Notice in Newspaper 15 Days Before Closure per 42 CFR 489.52(c) |        | 8/12/2019 |
| 1.2        | Nuclear Regulatory Commission  |   |        | 8/9/2019  |
| 1.3        | Drug Enforcement Administration  |   |        | 8/9/2019  |
| 1.4        | FTC (Radio Channels)   |   |        | 8/9/2019  |
| 1.5        | WV Department of Health & Human Resources                                    |   |        | 8/9/2019  |
| 1.6        | Bureau for Behavioral Health & Health Facilities                             |   |        | 8/9/2019  |
| 1.7        | Office for Emergency Medical Services  |   |        | 8/9/2019  |
| 1.8        | Health Care Authority  |   |        | 8/9/2019  |
| 1.9        | Office of Health Facility Licensure & Certification                          |   |        | 8/9/2019  |
|            | 1.9.1  | Publish Notice in Newspaper 21 Days Before Closure per WV Code 16-5B-16 |        | 8/12/2019 |
| 1.10       | Bureau for Medical Services (WV Medicaid)                                    |   |        | 8/9/2019  |
| 1.11       | Board of Medicine  |   |        | 8/9/2019  |
| 1.12       | Division of Labor/Workforce WV   |   |        | 8/9/2019  |
| 1.13       | City of Wheeling   |   |        | 8/9/2019  |
| 1.14       | Joint Commission   |   |        | 8/9/2019  |
| 1.15       | HFAP   |   |        | 8/9/2019  |
| 1.16       | College of American Pathologists   |   |        | 8/9/2019  |
| 1.17       | ACGME (Residency Program)  |   |        | 8/9/2019  |
| <b>2.0</b> | <b>Suspension/Closure of Outpatient Services</b>                             |   |        |           |
| 2.1        | <b>Stop Accepting New Patients for Outpatient Services</b>                   |   |        |           |
|            | 2.1.1  | Sleep Lab   |        | 8/16/2019 |
|            | 2.1.2  | Cardiac Testing   |        | 8/16/2019 |
|            | 2.1.3  | Physical Therapy  |        | 8/16/2019 |
|            | 2.1.4  | Occupational Therapy  |        | 8/16/2019 |

|     | Action Item   | Owner | Deadline  |
|-----|---|-------|-----------|
|     | 2.1.5 Speech Therapy  |       | 8/16/2019 |
|     | 2.1.6 Medical Oncology  |       | 8/16/2019 |
|     | 2.1.7 Radiation Oncology  |       | 8/16/2019 |
|     | 2.1.8 Laboratory Services   |       | 8/16/2019 |
|     | 2.1.9 Radiology   |       | 8/16/2019 |
|     | 2.1.10 Outpatient Behavioral Health   |       | 8/19/2019 |
| 2.2 | <b>Notice to Existing Patients Utilizing Outpatient Services Re: Suspension</b> |       |           |
|     | 2.2.1 Sleep Lab   |       | 8/12/2019 |
|     | 2.2.2 Cardiac Testing   |       | 8/12/2019 |
|     | 2.2.3 Physical Therapy  |       | 8/12/2019 |
|     | 2.2.4 Occupational Therapy  |       | 8/12/2019 |
|     | 2.2.5 Speech Therapy  |       | 8/12/2019 |
|     | 2.2.6 Medical Oncology  |       | 8/12/2019 |
|     | 2.2.7 Radiation Oncology  |       | 8/12/2019 |
|     | 2.2.8 Laboratory Services   |       | 8/12/2019 |
|     | 2.2.9 Radiology   |       | 8/12/2019 |
|     | 2.2.10 The Prescription Center (Outpatient Pharmacy)                            |       | 8/12/2019 |
|     | 2.2.10 Outpatient Behavioral Health   |       | 8/12/2019 |
| 2.3 | <b>Stop Providing Outpatient Services to Existing Patients/Suspend Services</b> |       |           |
|     | 2.3.1 Sleep Lab   |       | 8/31/2019 |
|     | 2.3.2 Cardiac Testing   |       | 8/31/2019 |
|     | 2.3.3 Physical Therapy  |       | 8/31/2019 |
|     | 2.3.4 Occupational Therapy  |       | 8/31/2019 |
|     | 2.3.5 Speech Therapy  |       | 8/31/2019 |
|     | 2.3.6 Medical Oncology  |       | 8/31/2019 |
|     | 2.3.7 Radiation Oncology  |       | 8/31/2019 |
|     | 2.3.8 Laboratory Services   |       | 8/31/2019 |
|     | 2.3.9 Radiology   |       | 8/31/2019 |
|     | 2.3.10 The Prescription Center (Outpatient Pharmacy)                            |       | 8/31/2019 |
|     | 2.3.10 Outpatient Behavioral Health   |       | 9/8/2019  |
| 3.0 | <b>Suspension/Closure of Surgical Services</b>                                  |       |           |
| 3.1 | <b>Stop Accepting New Patients for Elective Surgeries</b>                       |       |           |
|     | 3.1.1 Outpatient Surgery  |       | 8/16/2019 |
|     | 3.1.2 Surgeries Requiring Inpatient Admission                                   |       | 8/16/2019 |

|            | Action Item   |   | Owner | Deadline  |
|------------|---|---|-------|-----------|
| 3.2        | <b>Notify Existing Patients with Scheduled Surgeries</b>            |   |       |           |
|            | 3.2.1   | Outpatient Surgery                      |       | 8/12/2019 |
|            | 3.2.2   | Surgeries Requiring Inpatient Admission |       | 8/12/2019 |
| 3.3        | <b>Stop Performing Elective Surgeries</b>                           |   |       |           |
|            | 3.3.1   | Outpatient Surgery                      |       | 9/6/2019  |
|            | 3.3.2   | Surgeries Requiring Inpatient Admission |       | 9/3/2019  |
| <b>4.0</b> | <b>Obstetrical Services</b>   |   |       |           |
| 4.1        | Stop Scheduling Planned Deliveries                                  |   |       | 8/16/2019 |
| 4.2        | Notify Patients of No New Planned Deliveries                        |   |       | 8/16/2019 |
| 4.3        | Notify EMS Re: No Obstetrical Coverage for Emergency Department     |   |       | 8/9/2019  |
| 4.4        | Stop Planned/Scheduled Deliveries                                   |   |       | 8/31/2019 |
| 4.5        | Stop Emergency Deliveries   |   |       | 8/31/2019 |
| 4.6        | Suspend All Obstetrical Services                                    |   |       | 9/8/2019  |
| <b>5.0</b> | <b>Inpatient Services (Excluding Behavioral Health)</b>             |   |       |           |
| 5.1        | Notify Medical Staff of No Direct Admissions as of 8/16/19          |   |       | 8/9/2019  |
| 5.2        | Stop Direct Admissions  |   |       | 8/16/2019 |
| 5.3        | Stop Admissions from Emergency Department (See Item 6.0 Below)      |   |       | 9/3/2019  |
| 5.4        | Transfer Remaining Inpatients (Excluding Behavioral Health)         |   |       | 9/7/2019  |
| 5.5        | Suspend All Inpatient Services (Excluding Behavioral Health)        |   |       | 9/8/2019  |
| <b>6.0</b> | <b>Emergency Services</b>   |   |       |           |
| 6.1        | Notify EMS of Planned Suspension of Services and Limitations        |   |       | 8/8/2019  |
| 6.2        | Notify Public of Planned Suspension of Services                     |   |       | 8/12/2019 |
| 6.2        | Stop Accepting EMS Runs   |   |       | 9/3/2019  |
| 6.3        | Stop Accepting Walk-Ins   |   |       | 9/7/2019  |
| 6.4        | Suspend Emergency Services  |   |       | 9/8/2019  |
| <b>7.0</b> | <b>Inpatient Behavioral Health Services</b>                         |   | Sarao |           |
| 7.1        | Notify Referral Sources of Planned Suspension of Services           |   |       | 8/9/2019  |
| 7.2        | Notify Existing Patients/Families of Planned Suspension of Services |   |       | 8/9/2019  |
| 7.3        | Identify Alternative Facilities                                     |   |       | 8/9/2019  |
| 7.4        | Notify Public of Planned Suspension of Services                     |   |       | 8/9/2019  |
| 7.5        | Stop Admitting New Patients - Adult Unit                            |   |       | 8/23/2019 |
| 7.6        | Stop Admitting Existing Patients - Adult Unit                       |   |       | 8/28/2019 |
| 7.7        | Stop Admitting New Patients - Adolescent Unit                       |   |       | 8/23/2019 |

|            | Action Item  | Owner | Deadline  |
|------------|--|-------|-----------|
| 7.8        | Stop Admitting Existing Patients - Adolescent Unit         |       | 8/28/2019 |
| 7.9        | Transfer Remaining Patients                                |       | 9/7/2019  |
| 7.10       | Suspend all Inpatient Behavioral Health Services           |       | 9/8/2019  |
| <b>8.0</b> | <b>Medical Records</b>                                     |       |           |
| 8.1        | Secure Medical Records                                     |       | 8/9/2019  |
| 8.2        | Notice to Public Regarding Availability of Medical Records |       | 8/15/2019 |
| 8.3        | Make Arrangements for Continued Storage of Medical Records |       | 9/3/2019  |